

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-----------------------------------|---|------------------------|
| ERUBY ABREGO, |) | |
| <i>Plaintiff,</i> |) | No. 23 CV 1740 |
| |) | |
| v. |) | Hon. Steven C. Seeger, |
| |) | District Judge |
| REYNALDO GUEVARA, <i>et al.</i> , |) | |
| <i>Defendants.</i> |) | |
| |) | |
| |) | |
| |) | |

| | | |
|-----------------------------------|---|------------------------|
| JEREMIAH CAIN, |) | |
| <i>Plaintiff,</i> |) | No. 23 CV 14282 |
| |) | |
| v. |) | Hon. Steven C. Seeger, |
| |) | District Judge |
| REYNALDO GUEVARA, <i>et al.</i> , |) | |
| <i>Defendants.</i> |) | |
| |) | |
| |) | |
| |) | |

**PLAINTIFF'S MOTION TO COMPEL
DEFENDANTS TO PRODUCE OUTSTANDING DISCOVERY**

Exhibit List

| | |
|-----------|--|
| Exhibit 1 | Plaintiff's First Set of Interrogatories to Individual Defendant Officers |
| Exhibit 2 | Group Exhibit: Defendant Responses to Plaintiff's First Set of Interrogatories |
| Exhibit 3 | Defendants' Response to Plaintiff's Rule 37 Letter, March 22, 2024 |
| Exhibit 4 | Defendant City of Chicago's Answer to Plaintiff's First Set of Interrogatories |
| Exhibit 5 | Defendant City of Chicago's 37.2 Response |
| Exhibit 6 | Defendant City of Chicago's Discovery Responses Letter, October 4, 2024 |
| Exhibit 7 | Plaintiff's Letter to the City re: Discovery, October 15, 2024 |
| Exhibit 8 | Defendant City of Chicago's Answer to Plaintiff's First Request for Production |
| Exhibit 9 | Plaintiff's Letter to the City re: Discovery, July 15, 2024 |

- Exhibit 10 Plaintiff's Letter to the City re: 37.2 Conference Follow-Up
- Exhibit 11 Deposition Notice, June 17, 2024
- Exhibit 12 Deposition Notice, July 15, 2024
- Exhibit 13 Deposition Notice, October 9, 2024
- Exhibit 14 Confirming Email to Opposing Counsel re: Discovery Deadlines, August 30, 2024